

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: MARIA A. TOWNES, Debtor, MARIA A. TOWNES, Movant, v. REVERSE MORTGAGE SOLUTIONS, INC., Respondent.	Bankruptcy No. 16-16498-amc Chapter 13 Related to Document No. 51 Hearing Date: Hearing Time:.
---	--

AGREED ORDER OF COURT

AND NOW, this ____ day of _____, 2017, upon consideration of MARIA A. TOWNES (the “Debtor”)’s Motion to Reconsider Order Modifying Automatic Stay (the “Motion”), and after notice and hearing,

It is hereby **ORDERED** that the automatic stay is terminated as it affects the interests of Reverse Mortgage Solution, Inc. (“RMS”) with respect to that certain collateral referenced in RMS’s Motion for Relief from Stay (the “Motion for Relief”) filed at docket number 43, as being the property located at 614 Washington Avenue, Media, PA, 19063; PROVIDED HOWEVER, that this Order granting relief from stay is stayed for as long as:

- (1) The Debtor, within, ten (10) days of this Order, remits \$114.75 to the Chapter 13 Trustee in readily available funds (which is to be distributed by the Chapter 13 Trustee to RMS as adequate protection payment); and within sixty days of this Order remits an

additional \$114.75 to the Chapter 13 Trustee in readily available funds to be distributed as the second and final adequate protection payment; and

- (2) On a go forward basis from and after the date of this Order, the Debtor shall timely make full plan payments to the Chapter 13 Trustee, on or before the date upon which the respective plan payment is due.

It is hereby further **ORDERED** that *time is of the essence*. For the duration of this bankruptcy case, in the event that the Debtor fails to make any subsequent plan payments (as well as such other payments that may be required by this Order) to the Chapter 13 Trustee, then the stay of this Order shall be vacated and the automatic stay unconditionally lifted as it affects the interests of RMS with said property or collateral upon the filing of an Affidavit of Default by RMS without further hearing or without entry of an additional order. Such Affidavit of Default shall contain a statement of default as supported by the creditor's own records as well as the records of the Chapter 13 Trustee.

In the event that the automatic stay is terminated as provided in this Order, then the Trustee shall make no further disbursements to any creditor on account of any secured claim that is secured by the subject collateral, unless directed otherwise by further Order of Court.

BY THE COURT:

Hon. Ashely M. Chan
United States Bankruptcy Court Judge

Agreed to by:

BERNSTEIN-BURKLEY, P.C.

By: /s/ Daniel R. Schimizzi
PA I.D. #311869
dschimizzi@bernsteinlaw.com
707 Grant Street, Suite 2200, Gulf Tower
Pittsburgh, PA 15219
Phone: (412) 456-8102
Fax: (412) 456-8135

Counsel for Reverse Mortgage Solutions,
Inc.

AND

SADEK and COOPER

By: /s/ Brad J. Sadek
Sadek and Cooper
1315 Walnut Street
Suite 502
Philadelphia, PA 19107
215-545-0008
Fax : 215-545-0611
Email: brad@sadeklaw.com

Counsel for the Debtor